CCP EnviroNews

December 2003

Environmental News from the CCP - Saukville Facility

Welcome to the Fifth Edition of CCP EnviroNews

EnviroNews is one way for us to share information with neighbors and the Saukville community about new developments relating to CCP's environmental programs and performance. In this issue, you can read about:

- New equipment installed at the Saukville facility;
- Property maintenance activities;
- Our feature story—a summary of CCP's annual environmental progress report to the DNR;
- Update on CCP's environmental management system; and
- Noise and odor complaints.

As always, if you have any questions or concerns about CCP operations, please contact Plant Manager Glenn Preisler at 268-3395.

The CCP Saukville Facility Today

The CCP Saukville facility manufactures polyester and alkyd resins used in a variety of applications including the coatings, sanitary, automotive and marine industries. The facility began resin production in 1949 and employs approximately 65 full-time staff. CCP acquired the Saukville facility in December 1990 from Freeman Chemical Corporation. CCP is a joint venture company of TOTAL COMPOSITES INC., which is a subsidiary of the French oil, gas, refining, and chemical company TOTAL S.A., and Curran Composites Inc. of Kansas City, MO.

Our facility's current production capacity is approximately 52 million pounds of resin per year, produced in up to 3000 batches. Waste streams generated at the facility consist primarily of reaction water, spent solvents, filter cleaning residues, and off-spec materials.

New Equipment Installed to Expand Production of Environmentally Friendly Products

We have introduced a new product line of coatings and polymers which contain low amounts of hazardous chemicals that help our customers reduce emissions and meet Clean Air Act requirements. As a result, CCP now purchases far less solvents and has much less solvent waste to manage. Due to the success of these environmentally friendly products, we recently expanded the Saukville facility by adding a new process tank, storage tank for the low air pollution resin used to make these products and a 30,000 gallon storage tank for the final product. This expansion demonstrates that helping other companies protect the environment is becoming an important part of our business.

CCP HOTLINE
For odor, noise or other complaints

During business hours--284-0555
After hours--268-3399

Property Maintenance

The CCP Community Advisory Committee identified several property maintenance issues in 1993, including neglected stretches of the perimeter fence and overgrown weeds and vines. Repair of all damaged sections of the perimeter fence has now been completed. Cleanup of weeds, vines and litter along the perimeter fence has begun and should be complete by the end of the year. In addition, a weed prevention treatment will be applied in the spring.

Feature Story--CCP Submits Annual Report to DNR

In our Cooperative Environmental Agreement with the DNR, CCP committed to cease burning hazardous waste in our incinerator by September 30, 2001. As part of this agreement, we also committed to establish an environmental management system (EMS), and seek other opportunities for waste minimization, pollution prevention, product stewardship and other environmental benefits at our Saukville facility in cooperation with our neighbors, customers, the local community and DNR. In return, the DNR agreed not to require a new round of testing on the CCP hazardous waste incinerator since we were proposing to only burn nonhazardous wastes in the future. (A test burn is normally conducted prior to licensing an incinerator, or as part of a 10-year permit renewal process.)

We recently submitted a report to the DNR that demonstrates environmental progress made under the agreement. The report is summarized below. If you would like a copy of the full report, call Plant Manager Glenn Preisler at 268-3395.

Baseline—Before the Agreement

In order to measure progress under the agreement, the first section of the annual report describes the situation before the Cooperative Environmental Agreement was signed. In 2000, the CCP Saukville facility generated approximately 5 million pounds of a hazardous waste stream known as "reaction water", a by-product of a reaction between organic acids and glycol that produces the polyester and alkyd resins that we sell. Reaction water was burned on site in a hazardous waste incinerator. In 2000, our Saukville facility generated 1.8 million pounds of spent solvent that was also burned in the incinerator. Since the solvent was used as supplemental fuel to incinerate the reaction water, recycling the solvent was not considered economically attractive at the time.

The Results So Far

Recovery of Xylene Using New Technology

CCP commissioned a pollution prevention study focused on recovering xylene from the reaction water. This would reduce hazardous waste generated by eliminating the hazardous characteristics of the water. As a result, we installed new Macro Porous Polymer Extraction (MPPE) technology and stopped burning hazardous waste in its incinerator by September 30, 2001, two years before it would be required under U.S. Environmental Protection Agency regulations.

Glycol Recovery from Reaction Water

We also studied various techniques for recovering glycol from reaction water and concluded that the increased energy consumption to separate glycol from reaction water negates the benefits of glycol recovery. Glycol recovery could also negatively affect the reliability of the thermal oxidizer, resulting in more shutdowns and odor releases.

Xylene Waste Minimization

We have successfully reduced the amount of xylene used in rinsing process equipment, resulting in a decrease of over 220,000 pounds of xylene waste generated from 2001 to 2002. The use of solvent in resin production has also been reduced by segregating and reusing the solvent in subsequent batches. This solvent, when spent, must be shipped for beneficial reuse or fuel blending since the odor of the solvent makes it unsuitable for reuse at the Saukville facility.

Year	Xylene Used (pounds)
2000	**4,076,540**
2001	**3,159,320**
2002	**2,937,060**
2003 (estimated)	**2,740,000**

Community Outreach

The Community Advisory Committee, which includes all relevant stakeholders within the community, has met quarterly since January 2001, unless otherwise agreed upon by the committee. Meetings are open to the public, and public comment is accommodated at a set time on each agenda. CCP announces meetings in the newspaper and provides agendas and meeting summaries at the Saukville Public Library.

Other community outreach activities include:

1. CCP developed this newsletter (EnviroNews) to regularly communicate with nearby residences and businesses in Saukville, and others who indicate an interest in CCP and its environmental performance.
2. CCP developed a prototype chemical fact sheet for the community and neighbors and completed two fact sheets. Ten additional fact sheets, prioritized by chemical risk and use at the plant, should be available by the end of the year.
3. CCP repeats its Community Survey every 2 years to gauge public perception of CCP environmental performance. The second survey was conducted in 2002 (200 surveyed / 50 responded). The 2002 Community Survey results, and the comparison to 2000, were shared at the October 2002 Community Advisory Committee meeting.
4. In 2003, CCP did a survey of CCP performance from the perspective of the Community Advisory Committee.

Environmental Management System (EMS)
In 2002 and 2003, CCP implemented an environmental management system. CCP had previously developed various management system components such as Product Stewardship and Transportation Management based on guidelines provided by the National Paint and Coatings Association and the Composite Fabricators Association. We completed an internal audit of our environmental management system in September and plan an audit of the EMS by an outside auditor by spring of 2004.

Product Stewardship
CCP also agreed to take leadership in product stewardship--integrating environmental considerations into the design and development of our products. CCP led the commercial development of low-styrene composite resins as well as a water-based polymer dispersion used in water based coating and stains. The shift toward water-based dispersion products has contributed to a substantial reduction (33% from 2000) in xylene use at the plant (see table above).

CCP resins containing lower amounts of hazardous air pollutants are becoming chemical industry leaders that help our customers meet state and federal air pollution requirements. CCP continues growth and development of a profitable product line of aqueous cleaners and low emission solvent cleaners for use in the composites fabrication industry.

Cost Savings from Regulatory Flexibility
As a result of the Cooperative Environmental Agreement with the DNR, CCP was not required to do a new test burn for the remaining period of operation of the hazardous waste incinerator. We saved an estimated $400,000 of consultant and contractor costs, and hundreds of hours of CCP staff time. The incinerator now burns only nonhazardous reaction water.

CCP Community Advisory Committee Members

Matt Geib—CCP employee
Charles Kroeger—plant neighbor
Ann Lemons—village trustee
Carol Diggelman—professor at the Milwaukee School of Engineering
Jerry Dickmann—utility superintendent
Pat Brady—DNR Southeast Region
Tari Emerson—Charter Steel
Ray Meyer—plant neighbor
Bill Stolte—Ozaukee Co. Emergency Planning
Tim Lewein—neighbor
Paul Utecht—CCP employee and neighbor
Dale and Denise Jacoby—plant neighbors
Barb Dickmann—village president

Update on the CCP Environmental Management System (EMS)
Previous issues of this newsletter have discussed what an EMS is and why CCP has developed one. The easiest way to describe an environmental management system is a comprehensive approach to planning, controlling, measuring, and improving environmental performance. It takes a lot of work to set up an EMS, however once it is fully in place, CCP should become more efficient, more environmentally friendly, and more profitable. Ideally, an EMS will help us make the right products the right way, prevent accidental releases, pollution and waste, and help ensure compliance with environmental regulations.

CCP Saukville staff has completed development of the EMS and are putting it into practice. One

operation that is currently being evaluated is filtering of wastes. We are looking to move away from the current use of plate and frame filters and evaluating alternatives, including their environmental and economic impacts. We also plan to shut down our smaller non-hazardous waste incinerator by October 2004. We are now deciding how to minimize the amount of waste currently burned in this incinerator and how to manage those wastes that cannot be eliminated.

CCP has integrated a new safety and accident prevention system, called the Modern Safety Management System, into our Saukville plant operations. CCP's parent company audited this new system this fall, with very favorable results. We plan another "internal" audit next spring and an audit by an outside auditor next fall.

Noise and Odor Complaints

Since the last Community Advisory Committee meeting on July 9th, there have been nine odor complaints. Eight of the nine came in October after we made adjustments to the thermal oxidizer. CCP staff investigated the cause of the odor, made further adjustments to the thermal oxidizer and there have been no complaints since. There was also one complaint relating to resin specks on a car, which were due to a release from one of the chemical mixing tanks.

We are still hearing from a neighbor about noise and working on a new high level alarm system to address this concern. We have made modifications to the computer software and are in the process of changing to a different type of probe which detects a high level in a tank. Five tanks now have this new probe and we are testing to verify they are working properly. If these work as we think they will, other problem tanks will be changed over to this new type of probe, reducing the number of alarms going off at the plant.

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CCP